### FINANCIAL STATEMENTS – REGULATORY BASIS AND REPORTS OF INDEPENDENT AUDITOR

### CARLTON LANDING ACADEMY NO. E-20 PITTSBURG COUNTY, OKLAHOMA

**JUNE 30, 2022** 

#### Audited by

### BLEDSOE, HEWETT & GULLEKSON CERTIFIED PUBLIC ACCOUNTANTS, PLLLP

BROKEN ARROW, OK

## CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY, OKLAHOMA SCHOOL DISTRICT OFFICIALS JUNE 30, 2022

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### CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY, OKLAHOMA JUNE 30, 2022

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#### INDEPENDENT AUDITOR'S REPORT

To the Honorable Board of Education Carlton Landing Academy School No. E-20 Carlton Landing, Pittsburg County, Oklahoma

#### Report on the Audit of the Financial Statements

We have audited the accompanying combined fund type and account group financial statements-regulatory basis of the Carlton Landing Academy School No. E-20, Carlton Landing, Pittsburg County, Oklahoma (the School) as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the School's basic financial statements as listed in the table of contents.

#### Qualified Opinion on Regulatory Basis of Accounting

In our opinion, except for the effects of the matter discussed in the "Basis for Qualified Opinion on Regulatory Basis of Accounting" section of our report, the combined financial statements referred to above present fairly, in all material respects, the assets, liabilities and fund balances arising from regulatory basis transactions of each fund type and account group of the School as of June 30, 2022, and the revenues it received and expenditures it paid and encumbered for the year then ended, in accordance with the financial reporting provisions of the Oklahoma State Department of Education as described in Note 1.

#### Adverse Opinion on U.S. Generally Accepted Accounting Principles

In our opinion, because of the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" section of our report, the financial statements referred to in the first paragraph do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of the School as of June 30, 2022, or the revenues, expenses, and changes in net position and, where applicable, cash flows thereof for the year then ended.

#### **Basis for Opinions**

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the "Auditor's Responsibilities for the Audit of the Financial Statements" section of our report. We are required to be independent of the School and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our adverse and qualified audit opinions.

#### Basis for Qualified Opinion on Regulatory Basis of Accounting

As discussed in Note 1, the financial statements referred to above do not include the General Fixed Asset Account Group, which is a departure from the regulatory basis of accounting prescribed or permitted by the Oklahoma State Department of Education. The amount that should be recorded in the General Fixed Asset Account Group is not known.

#### Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles

As described in Note 1 to the financial statements, to meet the financial reporting requirements of the Oklahoma State Department of Education, the financial statements are prepared by the School, on the basis of the financial reporting regulations prescribed or permitted by the Oklahoma State Department of Education, which is a basis of accounting other than accounting principles generally accepted in the United States of America. The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material and pervasive.

#### Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with the financial reporting regulations prescribed or permitted by the Oklahoma State Department of Education as described in Note 1, to meet the financial reporting requirements of the State of Oklahoma; this includes determining that the regulatory basis of accounting is an acceptable basis for the preparation of the financial statements in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the School's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

#### Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards and Government Auditing Standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards and Government Auditing Standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to
  fraud or error, and design and perform audit procedures responsive to those risks. Such procedures
  include examining, on a test basis, evidence regarding the amounts and disclosures in the financial
  statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the School's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that
  raise substantial doubt about the School's ability to continue as a going concern for a reasonable
  period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

#### Supplementary Information

Our audit was conducted for the purpose of forming opinions on the fund type and account group financial statements-regulatory basis that collectively comprise the School's basic financial statements. The accompanying combining financial statements-regulatory basis and other supplementary information and schedule of expenditures of federal awards are presented for purposes of additional analysis and are not a required part of the combined financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the combined financial statements-regulatory basis. The information has been subjected to the auditing procedures applied in the audit of the fund type and account group financial statements within the combined financial statements-regulatory basis and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, except for the financial statements being prepared in compliance with the regulatory basis as prescribed by the Oklahoma State Department of Education as discussed in Note 1, the combining financial statements-regulatory basis and other supplementary information and the schedule of expenditures of federal awards are fairly stated, in all material respects, in relation to the combined financial statements-regulatory basis as a whole.

#### Other Reporting Required by Government Auditing Standards

In accordance with Government Auditing Standards, we have also issued our report dated March 10, 2023, on our consideration of the School's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the School's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with Government Auditing Standards in considering the School's internal control over financial reporting and compliance.

Bledsoe, Hewett & Gullekson

Bledsoe, Hewett & Gullekson Certified Public Accountants, PLLLP

March 10, 2023

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## INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

To the Honorable Board of Education Carlton Landing Academy School No. E-20 Carlton Landing, Pittsburg County, Oklahoma

We have audited in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the fund type and account group financial statements – regulatory basis of the Carlton Landing Academy Independent School No. E-20, Carlton Landing, Pittsburg County, Oklahoma (the School), as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the School's basic financial statements, and have issued our report thereon dated March 10, 2023, which was adverse with respect to the presentation of the financial statements in conformity with accounting principles generally accepted in the United States because the presentation followed the regulatory basis of accounting for Oklahoma school districts as provided by the Oklahoma State Department of Education. However, our report was qualified because the omission of the general fixed asset account group results in an incomplete presentation with respect to the presentation of financial statements on the regulatory basis of accounting authorized by the Oklahoma State Board of Education.

#### **Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the School's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of School's internal control. Accordingly, we do not express an opinion on the effectiveness of School's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or, significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

#### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the School's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, non-compliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

#### Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the School's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Bledsoe, Hewett & Gullekson

Bledsoe, Hewett & Gullekson Certified Public Accountants, PLLLP

March 10, 2023

#### CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY, OKLAHOMA DISPOSITION OF PRIOR YEAR'S SIGNIFICANT DEFICIENCIES AND MATERIAL INSTANCES OF NON-COMPLIANCE JUNE 30, 2022

There were no prior year significant deficiencies.

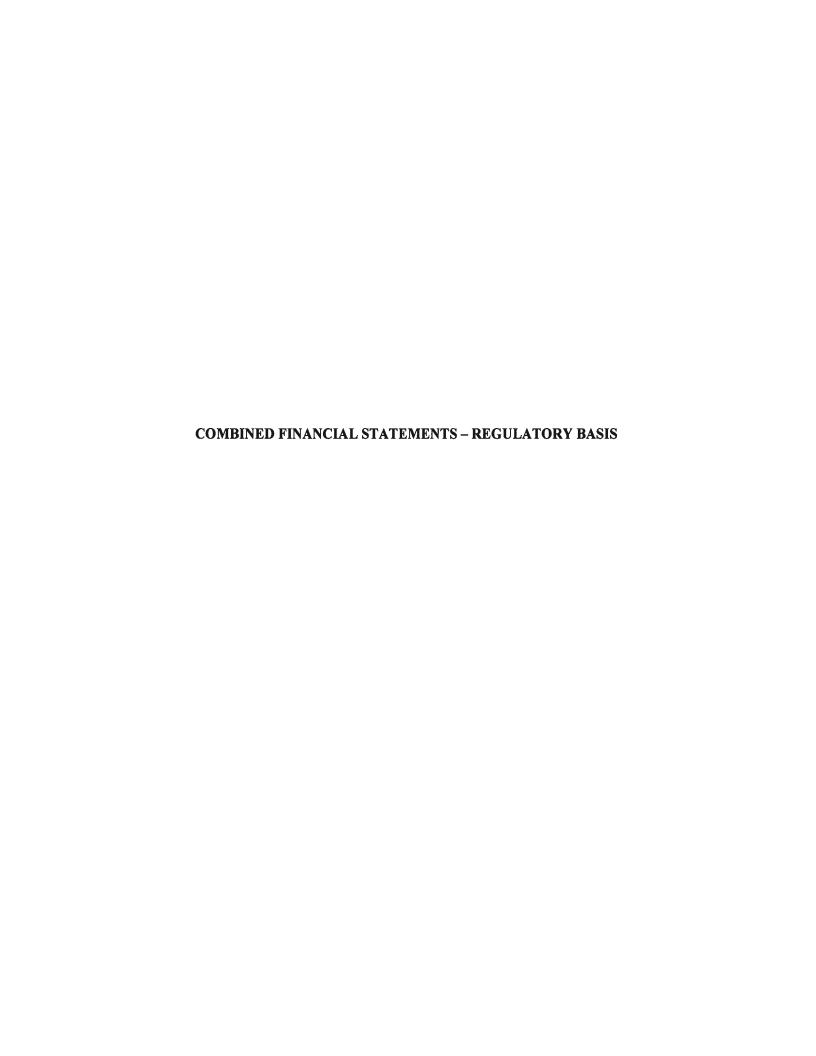
## CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY, OKLAHOMA SCHEDULE OF AUDIT RESULTS, FINDINGS AND QUESTIONED COSTS JUNE 30, 2022

#### <u>Section 1</u> – Summary of Auditor's Results:

- 1. An adverse opinion was issued on the combined financial statements in conformity with generally accepted accounting principles, and an unmodified opinion was issued on the combined financial statements in conformity with a regulatory basis of accounting prescribed by the Oklahoma State Department of Education.
- 2. The audit did not identify any material weaknesses and did not report any significant deficiencies not considered to be material weaknesses in the internal controls over financial reporting.
- 3. The audit disclosed no instances of noncompliance which are material to the financial statements.

<u>Section 2</u> – Findings relating to the financial statements required to be reported in accordance with GAGAS:

**NONE** 



# CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCE ALL FUND TYPES AND ACCOUNT GROUPS - REGULATORY BASIS JUNE 30, 2022

		RNMENTAL ID TYPES	FIDUCIARY FUND TYPES			
	GENERAL FUND				TRUST & AGENCY	TOTALS (MEMORANDUM ONLY)
<u>ASSETS</u>						
Cash	\$	277,016	3,348	280,364		
LIABILITIES AND FUND BALANCE						
Liabilities: Warrants/checks payable	\$	29,262		29,262		
Encumbrances		9,450		9,450		
Funds held for school organizations  Total liabilities		38,712	3,348 3,348	3,348 42,060		
		30,7 12		42,000		
Fund Balance:		238,304	0	238,304		
Unassigned		230,304		230,304		
Total Liabilities and Fund Balance	\$	277,016	3,348	280,364		

The notes to the combined financial statements are an integral part of this statement

# CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN CASH FUND BALANCES - ALL GOVERNMENTAL FUND TYPES - REGULATORY BASIS FOR THE YEAR ENDED JUNE 30, 2022

	RNMENTAL D TYPES
	NERAL UND
Revenues Collected:	
Local sources	\$ 94,938
State sources	422,973
Federal sources	230,194
Total revenues collected	 748,105
Expenditures:	
Instruction	352,154
Support services	347,013
Other outlays:	
Reimbursements	11,542
Total expenditures	710,709
Excess of revenues collected over (under)	
expenditures before other financing	
sources (uses)	37,396
Other financing sources (uses):	
Adjustments to prior year encumbrances	 876
Excess of revenues collected over	
(under) expenditures	38,272
Cash fund balances, beginning of year	 200,032
Cash fund balances, end of year	\$ 238,304

The notes to the combined financial statements are an integral part of this statement

# CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN CASH FUND BALANCES - BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS FOR THE YEAR ENDED JUNE 30, 2022

		GENERAL FUND	
	Original/Final Budget	Actual	Prior Year (Memorandum Only)
Revenues Collected:			
Local sources	\$ 60,000	94,938	202,003
State sources	439,007	422,973	425,992
Federal sources	281,102	230,194	169,597
Non-revenue receipts			30,000
Total revenues collected	780,109	748,105	827,592
Expenditures:			
Instruction	353,000	352,154	359,085
Support services	350,500	347,013	352,202
Other outlays:			
Reimbursements	12,000	11,542	
Other uses/ Unbudgeted	264,641		
Total expenditures	980,141	710,709	711,287
Excess of revenues collected over (under) expenditures before other financing	(200, 022)	27 200	440 205
sources (uses)	(200,032)	37,396	116,305
Other financing sources (uses): Adjustments to prior year encumbrances	0	876	9,788
Excess of revenues collected			
over (under) expenditures	(200,032)	38,272	126,093
Cash fund balance, beginning of year	200,032	200,032	73,939
Cash fund balance, end of year	\$ 0	238,304	200,032

The notes to the combined financial statements are an integral part of this statement

NOTES TO COMBINED FINANCIAL STATE	EMENTS – REGULATORY BASIS

#### 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accompanying financial statements of the Carlton Landing Academy No. E-20 (the "School") have been prepared in conformity with another comprehensive basis of accounting prescribed by the Oklahoma State Department of Education as authorized by Oklahoma Statutes. Accordingly, the accompanying financial statements are not intended to present financial positon and results of operations in conformity with the accounting principles generally accepted in the United States of America. The School's accounting policies are described in the following notes that are an integral part of the School's financial statements.

#### A. Reporting Entity

Carlton Landing, Inc., an Oklahoma not-for profit corporation described in Internal Revenue Code Section 501(c)(3), was formed for the benefit of a charter school to be called Carlton Landing Academy. The School operates under provisions of the Oklahoma Charter Schools Act through a contract with Independent School District No. 2 of Pittsburg County (Canadian Public Schools), as its sponsoring school. Approval was granted by the Oklahoma State Department of Education and School operations began in July 2016. The School is also a corporate body for public purposes created under Title 70 of the Oklahoma Statutes and accordingly is a separate entity for operating and financial reporting purposes. The School is part of the public school system of Oklahoma under the general direction and control of the State Board of Education and is financially dependent on State of Oklahoma support. The general operating authority for the public school system is the Oklahoma School Code contained in Title 70, Oklahoma Statutes.

The governing body of the School is the Board of Education composed of up to seven appointed members. The appointed Head of School is the executive officer of the School. The Board, constituting an on-going entity, is the level of government, which has governance responsibilities over all activities, related to public elementary and secondary school education within the jurisdiction of the local independent school district. The District receives funding from local, state and federal government sources and must comply with the requirements of these funding source entities.

In evaluating how to define the School, for financial reporting purposes, management has considered all potential component units. The decision to include a potential component unit in the reporting entity was made by applying the criteria established by the Governmental Accounting Standards Board (GASB). The basic – but not the only – criterion for including a potential component unit within the reporting entity is the governing body's ability to exercise oversight responsibility. The most significant manifestation of this ability is financial interdependency. Other manifestations of the ability to exercise oversight responsibility include, but are not limited to, the selection of governing authority, the designation of management, the ability to significantly influence operations and accountability for fiscal matters. A second criterion used in evaluating potential component

#### 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

#### A. Reporting Entity - cont'd

units is the scope of public service. Application of this criterion involves considering whether the activity benefits the School and/or its citizens, or whether the activity is conducted within the geographic boundaries of the School and is generally available to its patrons. A third criterion used to evaluate potential component units for inclusion or exclusion from the reporting entity is the existence of special financing relationships, regardless of whether the School is able to exercise oversight responsibilities. Based upon the application of these criteria, there are no potential component units included in the School's reporting entity.

#### B. Measurement Focus

The School uses funds and account groups to report on its financial position and the results of its operations. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain School functions or activities.

A fund is a separate accounting entity with a self-balancing set of accounts. An account group, on the other hand, is a financial reporting device designed to provide accountability for certain assets and liabilities that are not recorded in the funds because they do not directly affect net expendable available financial resources.

Funds are classified into three categories: Governmental, proprietary and fiduciary. Each category, in turn, is divided into separate "fund types."

#### **Governmental Fund Types**

Governmental funds are used to account for all or most of a government's general activities, including the collection and disbursement of earmarked monies (special revenue funds), the acquisition or construction of general fixed assets (capital projects funds), and the servicing of general long-term debt (debt service funds).

General Fund – The general fund is used to account for all financial transactions except those required to be accounted for in another fund. Major revenue sources include state and local property taxes and state funding under the Foundation and Incentive Aid Program. Expenditures include all costs associated with the daily operations of the School except for programs funded for building repairs and maintenance, school construction and debt service on bonds and other long-term debt. The general fund includes federal and state restricted monies that must be expended for specific programs.

#### 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

#### B. Measurement Focus - cont'd

<u>Special Revenue Funds</u> – Special revenue funds account for revenue sources that are restricted to expenditures for specific purposes. The special revenue funds for the School typically include the child nutrition funds.

<u>Child Nutrition Fund</u> - The child nutrition fund consists of monies derived from federal and state financial assistance and food sales. This fund is used to account for the various nutrition programs provided to students. The School operates their child nutrition program within the general fund.

#### **Fiduciary Fund Types**

Fiduciary funds are used to account for assets held on behalf of outside parties, including other governments, or on behalf of other funds within the School. The terms "non-expendable" and "expendable" refer to whether or not the School is under an obligation to maintain the trust principal. Agency funds generally are used to account for assets that the School holds on behalf of others as their agent and do not involve measurement of results of operation.

<u>Expendable Trust Funds</u> – Expendable trust funds typically include the gifts and endowments fund. The School did not maintain any expendable trust funds during the 2021-22 fiscal year.

Gifts and Endowments Fund – The gifts and endowments fund receives its assets by way of philanthropic foundations, individuals, or private organizations for which no repayment or special service to the contributor is expected. This fund is used to promote the general welfare of the School.

<u>Agency Fund</u> – The agency fund is the school activities fund which is used to account for monies collected principally through the fundraising efforts of students and school-sponsored groups. The administration is responsible, under the authority of the Board, for collecting, disbursing and accounting for these activity funds.

#### **Account Groups**

An account group is not a fund and consists of a self-balancing set of accounts used only to establish accounting control over long-term debt and fixed assets.

#### 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

#### B. Measurement Focus - cont'd

#### Memorandum Only - Total Column

The total column on the combined financial statements – regulatory basis is captioned "memorandum only" to indicate that it is presented only to facilitate financial analysis. Data in this column does not present financial position or results of operations in conformity with accounting principles generally accepted in the United States. Neither is such data comparable to a consolidation. Interfund eliminations have not been made in the aggregation of this data.

#### C. Basis of Accounting and Presentation

The School prepares its financial statements in a presentation format that is prescribed by the Oklahoma State Department of Education. This format is essentially the generally accepted form of presentation used by state and local governments prior to the effective date of GASB Statement No. 34, Basic Financial Statements – Management's Discussion and Analysis for State and Local Governments with certain modifications. This format differs significantly from that required by GASB 34.

The financial statements are essentially prepared on the basis of cash receipts and disbursements modified as required by the regulations of the Oklahoma State Department of Education as follows:

- Encumbrances represented by purchase orders, contracts, and other commitments for the expenditure of monies are recorded as expenditures when approved.
- Investments are recorded as assets when purchased.
- Inventories of school supplies are recorded as expenditures and not as inventory assets.
- Warrants/checks payable are recorded as liabilities when issued.
- Long-term debt is recorded in the General Long-Term Debt Account Group and not in the basic financial statements.
- Compensated absences are recorded as expenditures when paid and not recorded as a liability.
- Fixed assets are recorded in the General Fixed Asset Account Group and not in the basic financial statements. Fixed assets are not depreciated.

This regulatory basis of accounting differs from accounting principles generally accepted in the United States of America, which require revenues to be recognized when they become available and measurable, or when they are earned, and expenditures or expenses to be recognized when the related liabilities are incurred for governmental fund types; and, when revenues are earned.

#### 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

#### C. Basis of Accounting and Presentation - cont'd

Basis of accounting refers to when revenues and expenditures are recognized in the accounts and reported in the financial statements. Basis of accounting relates to the timing of the measurements made, regardless of the measurement focus applied. All governmental type funds are accounted for using the regulatory basis of accounting. Revenues are recognized when they are received rather than earned and expenditures are generally recognized when encumbered/reserved rather than at the time the related fund liability is incurred. These practices differ from accounting principles generally accepted in the United States.

#### D. Budgets and Budgetary Accounting

The School is required by state law to prepare an annual budget. The Board of Education must request an initial temporary appropriations budget from their County Excise Board before June 30. The School uses the temporary appropriation amounts as their legal expenditure limit until the annual Estimate of Needs is completed.

A budget is legally adopted by the Board of Education for all funds (with the exception of the trust and agency funds) that includes revenues and expenditures. No later than October 1, each Board of Education shall prepare a financial statement and Estimate of Needs to be filed with the applicable County Clerk and the State Department of Education.

The 2021-22 Estimate of Needs was not amended by any supplemental appropriations. Any amendments must be approved by the County Excise Board.

Encumbrances represent commitments related to unperformed contracts for goods or services. Encumbrance accounting – under which purchase orders and other commitments of resources are recorded as expenditures of the applicable fund – is utilized in all governmental funds of the School. Unencumbered appropriations lapse at the end of each fiscal year. While the Debt Service Fund is a governmental fund, a comparison of budget to actual schedule is presented in the financial statements, although the Board can exercise no control of the revenue sources for this fund (except interest earnings), and no control over its expenditures.

#### E. Assets, Liabilities and Fund Equity

<u>Cash and Cash Equivalents</u> – The School considers all cash on hand, demand deposit accounts, and highly liquid investments, with an original maturity of three months or less when purchased, to be cash and cash equivalents.

#### 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

#### E. Assets, Liabilities and Fund Equity - cont'd

<u>Investments</u> – The School considers investments of direct obligations of the United States government and agencies, certificates of deposits, savings accounts or savings certificates with maturities of greater than three months. All investments are recorded at cost, which approximates market value.

<u>Inventories</u> – The value of consumable inventories at June 30, 2022 is not material to the combined financial statements.

<u>Fixed Assets and Property, Plant and Equipment</u> – The School does not own and has not purchased any fixed assets that would be considered material to the financial statements. The school entered into a lease agreement with Carlton Landing, Inc. for the use of the building in which they operate.

<u>Warrants/Checks Payable</u> – Warrants/checks are issued to meet the obligations for goods and services provided to the School. The School recognizes a liability for the amount of outstanding warrants/checks that have yet to be redeemed by the School's bank.

<u>Encumbrances</u> – Encumbrances represent commitments related to purchase orders, contracts, other commitments for expenditures or resources, and goods or services received by the School for which a check has not been issued. An expenditure is recorded and a liability is recognized for outstanding encumbrances at year end in accordance with the regulatory basis of accounting. While the regulatory basis that is used for the Debt Service Fund approximates full accrual accounting, the accruals recorded are reported to meet regulatory requirements, as opposed to the requirements of generally accepted accounting principles.

Compensated Absences – The School provides vacation and sick leave benefits in accordance with Title 70 of the Oklahoma Statutes, Article 6-104, which provides for annual sick leave and personal business days. School policy allows certified employees to accumulate such days to a maximum number of days. Vested or accumulated vacation leave that is expected to be liquidated with expendable available financial resources had not been reported as an expenditure of the governmental fund that will pay it since the financial statements have been prepared on the regulatory basis of accounting. This practice differs from generally accepted accounting principles.

<u>Funds Held for School Organizations</u> – Funds held for school organizations represent the funds received or collected from students or other cocurricular and extracurricular activities conducted in the School, control over which is exercised by the board of education. These funds are credited to the account maintained for the benefit of each particular activity within the school activity fund.

#### SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

#### E. Assets, Liabilities and Fund Equity - cont'd

<u>Long-Term Debt</u> – Long-term debt is recognized as a liability of a governmental fund when due, or when resources have been accumulated in the debt service fund for payment early in the following year. For other long-term obligations, only that portion expected to be financed from expendable available financial resources is reported as a fund liability of a governmental fund. The remaining portion of such obligations is reported in the general long-term debt account group.

<u>Fund Balance</u> – In the fund financial statements, governmental funds report the hierarchy of fund balances. The hierarchy is based primarily on the degree of spending constraints placed upon use of resources for specific purposes versus availability of appropriation. An important distinction that is made in reporting fund balance is between amounts that are considered *nonspendable* (i.e., fund balance associated with assets that are not in spendable form, such as inventories or prepaid items, long-term portions of loans and notes receivable, or items that are legally required to be maintained intact (such as the corpus of a permanent fund) and those that are *spendable* (such as fund balance associated with cash, investments or receivables).

Amounts in the spendable fund balance category are further classified as restricted, committed, assigned or unassigned, as appropriate.

**Restricted** fund balance represents amounts that are constrained either externally by creditors (such as debt covenants), grantors, contributors or laws or regulations of other governments; or by law, through constitutional provisions or enabling legislation.

Committed fund balance represents amounts that are useable only for specific purposes by formal action of the government's highest level of decision-making authority. Such amounts are not subject to legal enforceability (like restricted amounts) but cannot be used for any other purpose unless the government removes or changes the limitation by taking action similar to that which imposed the commitment.

Assigned fund balance represents amounts that are intended to be used for specific purposes but are neither restricted nor committed. Intent is expressed by the governing body itself, or a subordinated high-level body or official who the governing body has delegated the authority to assign amounts to be used for specific purposes. Assigned fund balances include all remaining spendable amounts (except negative balances) that are reported in governmental funds other than the general fund, that are neither restricted nor committed, and amounts in the general fund that are intended to be used for specific purposes in accordance with the provisions of the standard.

#### 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

#### E. Assets, Liabilities and Fund Equity - cont'd

**Unassigned** fund balance is the residual classification for the general fund. It represents the amounts that have not been assigned to other funds, and that have not been restricted, committed, or assigned to specific purposes within the general fund.

#### F. Revenue and Expenditures

Local Revenues - Revenue from local sources is the money generated from within the boundaries of the School and available to the School for its use. The School is authorized by state law to levy property taxes which consist of ad valorem taxes on real and personal property within the School. These property taxes are distributed to the School's general, building and sinking funds based on the levies approved for each fund. The County Assessor, upon receipt of the certification of tax levies from the county excise board, extends the tax levies on the tax rolls for submission to the county treasurer prior to October 1. The county treasurer must commence tax collection within fifteen days of receipt of the tax rolls. The first half of taxes is due prior to January 1. The second half is due prior to April 1. If the first payment is not made in a timely manner, the entire tax becomes due and payable on January 2. Second half taxes become delinquent on April 1, of the year following the year of assessment. If not paid by the following October 1, the property is offered for sale for the amount of taxes due. The owner has two years to redeem the property by paying the taxes and penalty owed. If at the end of two years the owner has not done so, the purchaser is issued a deed to the property. Other local sources of revenues include tuition, fees, rentals, disposals, commissions and reimbursements.

<u>Intermediate Revenues</u> - Revenue from intermediate sources is the amount of money from funds collected by an intermediate administrative unit, or a political subdivision between the School and the state and distributed to Schools in amounts that differ in proportion to those which are collected within such systems.

<u>State Revenues</u> – Revenues from state sources for current operations are primarily governed by the state aid formula under the provisions of Article XVIII, Title 70, Oklahoma Statutes. The State Board of Education administers the allocation of state aid funds to school districts based on information accumulated from the Schools.

After review and verification of reports and supporting documentation, the State Department of Education may adjust subsequent fiscal period allocations of money for prior year errors disclosed by review. Normally, such adjustments are treated as reductions from or additions to the revenue of the year when the adjustment is made.

The School receives revenue from the state to administer certain categorical educational programs. State Board of Education rules require that revenue earmarked for these programs be expended only for the program for which the money is provided and require that the

#### 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

#### F. Revenue and Expenditures - cont'd

money not expended as of the close of the fiscal year be carried forward into the following year to be expended for the same categorical programs. The State Department of Education requires that categorical educational program revenues be accounted for in the general fund.

<u>Federal Revenues</u> – Federal revenues consist of revenues from the federal government in the form of operating grants or entitlements. An operating grant is a contribution to be used for a specific purpose, activity or facility. A grant may be received either directly from the federal government or indirectly as a passthrough from another government, such as the state. Entitlement is the amount of payment to which the School is entitled pursuant to an allocation formula contained in applicable statutes. All federal revenues received by the School are apportioned to the general fund.

Non-Monetary Transactions – When applicable, the School receives commodities form the U.S. Department of Agriculture. The value of these commodities has been included in the Schedule of Expenditures of Federal Awards; however, they have not been included in the financial statements as either revenue or expense since they are not reported under the regulatory basis of accounting.

<u>Interest Earnings</u> – Represent compensation for the use of financial sources over a period of time.

<u>Non-Revenue Receipts</u> – Non-revenue receipts represent receipts deposited into a fund that are not new revenues to the School, but the return of assets.

<u>Instruction Expenditures</u> – Instruction expenditures include the activities dealing directly with the interaction between teachers and students. Teaching may be provided for students in a school classroom, in another location, such as a home or hospital, and in other learning situations, such as those involving cocurricular activities. It may also be provided through some other approved medium, such as television, radio, telephone, and correspondence. Included here are the activities of teacher assistants of any type (clerks, graders, teaching machines, etc.) which assist in the instructional process. The activities of tutors, translators and interpreters would be recorded here. Department chairpersons who teach for any portion of time are included here. Tuition/transfer fees paid to other LEAs would be included here.

<u>Support Services Expenditures</u> – Support services expenditures provide administrative, technical (such as guidance and health) and logistical support to facilitate and enhance instruction. These services exist as adjuncts for fulfilling the objectives of instruction, community services and enterprise programs, rather than as entities within themselves.

<u>Operation of Non-Instructional Services Expenditures</u> – Activities concerned with providing non-instructional services to students, staff or the community.

#### 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

#### F. Revenue and Expenditures – cont'd

<u>Facilities Acquisition and Construction Services Expenditures</u> – Consists of activities involved with the acquisition of land and buildings; remodeling buildings; the construction of buildings and additions to buildings; initial installation or extension of service systems and other built-in equipment; and improvements to sites.

Other Outlays Expenditures – A number of outlays of governmental funds are not properly classified as expenditures, but still require budgetary or accounting control. These are classified as Other Outlays. These include debt service payments (principal and interest).

Other Uses Expenditures – This includes scholarships provided by private gifts and endowments; student aid and staff awards supported by outside revenue sources (i.e., foundations). Also, expenditures for self-funded employee benefit programs administered either by the School or a third-party administrator.

<u>Repayment Expenditures</u> – Repayment expenditures represent checks/warrants issued to outside agencies for refund or restricted revenue previously received for overpayment, non-qualified expenditures and other refunds to be repaid from School funds.

<u>Interfund Transactions</u> — Quasi-external transactions are accounted for as revenues, expenditures or expenses. Transactions that constitute reimbursements to a fund or expenditures/expenses initially made from it that are properly applicable to another fund, are recorded as expenditures/expenses in the fund that is reimbursed.

All other interfund transactions, except quasi-external transactions and reimbursements, are reported as transfers. Nonrecurring or nonroutine permanent transfers of equity are reported as residual equity transfers. All other interfund transfers are reported as operating transfers. There were no interfund transfers made during the 2021-22 fiscal year.

#### 2. CASH AND INVESTMENTS

<u>Custodial Credit Risk</u> – Custodial credit risk is the risk that in the event of a bank failure, the School's deposits may not be returned to the School. The School's cash deposits and investments at June 30, 2022 were \$262,383 at financial institutions, and were completely insured or collateralized by federal depository insurance, direct obligations of the U.S. Government, or securities held by the School or by its agent in the School's name.

#### 2. CASH AND INVESTMENTS - cont'd

<u>Investment Interest Rate Risk</u> – Interest rate risk is the risk that changes in interest rates will adversely affect the fair market value of an investment. Due to the required liquidity for those investments, these funds have no defined maturity dates. The School does not have a formal policy that limits investment maturities as a means of managing its exposure to fair value losses from increasing interest rates.

<u>Investment Credit risk</u> – Credit risk is the risk that the issuer or other counterparty to an investment will not fulfill its obligations. The School does not have a formal policy limiting its investment choices, other than the limitation of state law as follows:

- Direct obligations of the U.S. Government, its agencies and instrument to which the full faith and credit of the U.S. Government is pledged, or obligations to the payment of which the full faith and credit of the State is pledged.
- Certificates of deposit or savings accounts that are either insured or secured with acceptable collateral with in-state financial institutions, and fully insured certificates of deposit or savings accounts in out-of-state financial institutions.
- With certain limitation, negotiable certificates of deposit, prime bankers acceptances, prime commercial paper and repurchase agreements with certain limitations.
- County, municipal or school tax supported debt obligations, bond or revenue anticipation notes, money judgments, or bond or revenue anticipation notes of public trusts whose beneficiary is a county, municipality or school district.
- Notes or bonds secured by mortgage or trust deed insured by the Federal Housing Administrator and debentures issued by the Federal Housing Administrator, and in obligations of the National Mortgage Association.
- Money market funds regulated by the SEC and in which investments consist of the investments mentioned in the previous bullet items.

<u>Concentration of Investment Credit Risk</u> – The School places no limit on the amount it may invest in any one issuer.

#### 3. INTERFUND RECEIVABLES AND PAYABLES

There were no interfund receivables or payables at June 30, 2022.

#### 4. GENERAL LONG-TERM DEBT

The District did not maintain any long-term debt as of June 30, 2022.

#### 5. EMPLOYEE RETIREMENT SYSTEM

#### Description of Plan

The School participates in the state-administered Oklahoma Teachers' Retirement System, which is a cost sharing, multiple-employer defined benefit public employee retirement system (PERS), which is administered by the Board of Trustees of the Oklahoma Teachers' Retirement System (the "System"). The System provides retirement and disability benefits, annual cost-of-living adjustments, and death benefits to plan members and beneficiaries. Title 70 Section 17 of the Oklahoma Statutes establishes benefit provisions and may be amended only through legislative action. The Oklahoma Teachers' Retirement System issues a publicly available financial report that includes financial statements and required supplementary information for the System. That report may be obtained by writing to the Oklahoma Teachers' Retirement System, P.O. Box 53624, Oklahoma City, OK 73152, or by calling 405-521-2387.

#### **Basis of Accounting**

The System's financial statements are prepared using the cash basis of accounting, except for accruals of interest income. Plan member contributions are recognized in the period in which the contributions are made. Benefits and refunds are recognized when paid. The pension benefit obligation is a standardized disclosure measure of the present value of pension benefits. This pension valuation method reflects the present value of estimated pension benefits that will be paid in future years as a result of employee services performed to date and is adjusted for the effect of projected salary increases. There are no actuarial valuations performed on individual school districts. The System has an under-funded pension benefit obligation as determined as part of the latest actuarial valuation.

#### **Funding Policy**

The School, the State of Oklahoma, and the participating employee make contributions. The contribution rates for the School and its employees are established by and may be amended by Oklahoma Statutes. The rates are not actuarially determined. The rates are applied to the employee's earnings plus employer-paid fringe benefits. The required contribution for the participating members is 7.0% of compensation. Contributions received by the System from the State of Oklahoma are used to offset required employer contributions by the local school district. For the 2021-22 fiscal year, the School contributed 9.5% and the State of Oklahoma contributed the remaining amount during the year.

#### 5. EMPLOYEE RETIREMENT SYSTEM - cont'd

#### **Funding Policy**

The School is allowed by Oklahoma Teachers' Retirement System to make the required contributions on behalf of the participating members. In addition, if a member's salary is paid in part by federal or private funds, the contribution on that portion of the salary paid by those funds must be matched by the School at 7.90%.

#### **Annual Pension Cost**

The School's total contributions for 2022, 2021 and 2020 were \$64,672, \$56,873 and \$58,911, respectively. Ten-year historical trend information is presented in the Teacher's Retirement System of Oklahoma Annual Report for the year ended June 30, 2022. This information is useful in assessing the pension plan's accumulation of sufficient assets to pay pension benefits as they become due. Please visit www.ok.gov/TRS for all plan information.

GASB Statement 68 became effective for fiscal years beginning after June 15, 2014, and significantly changes pension accounting and financial reporting for governmental employers who participate in a pension plan, such as the System, and who prepare published financial statements on an accrual basis using Generally Accepted Accounting Principles. Since the School does not prepare and present their financial statements on an accrual basis, the net pension amount is not required to be presented on the audited financial statements.

#### 6. RISK MANAGEMENT

The School is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; or acts of God. The School purchases commercial insurance to cover these risks, including general and auto liability, property damage, and public officials' liability. Settled claims resulting from risks have not exceeded the commercial insurance coverage in any of the past three fiscal years.

#### 7. CONTINGENCIES

#### **Federal Grants**

Amounts received or receivable from grant agencies are subject to audit and adjustment by grantor agencies. Any disallowed claims, including amounts already collected, may constitute a liability of the applicable funds. The amounts, if any, of expenditures which may be disallowed by the grantor cannot be determined at this time, although the School expects such amounts, if any, to be immaterial.

#### 7. CONTINGENCIES – cont'd

#### Schedule of Expenditure of Federal Awards

The schedule shows the federal awards received and expended by the School during the 2021-22 fiscal year. The revised Uniform Guidance Audits of States, Local Governments and Non-Profit Organizations, established uniform audit requirements for nonfederal entities which expended more than \$750,000 in federal awards.

The School did not fall under this threshold for the 2021-22 fiscal year, therefore, this schedule is not required and is for informational purposes only.

#### Litigation

School officials are not aware of any pending or threatened litigation, claims or assessments or unasserted claims or assessments against the School.

#### 8. RELATED PARTY TRANSACTIONS

The foundation for Carlton Landing Academy, The Carlton Landing Community Foundation, Inc. (the Foundation), was formed to support the needs of Carlton Landing Academy, as defined by the School and the Foundation's governing boards. The School entered into a lease agreement with the Foundation for the use of school buildings. The School pays all operating expenses for maintaining the buildings and pays the Foundation \$1 per year for rent.



# CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY COMBINING STATEMENT OF CHANGES IN ASSETS AND LIABILITIES - AGENCY FUNDS - REGULATORY BASIS FOR THE YEAR ENDED JUNE 30, 2022

ASSETS		ANCE 01-21	ADDITIONS	NET TRANSFERS	DEDUCTIONS	BALANCE 6-30-22
AGGLIG						
Cash	\$	8,200	3,169	0	8,021	3,348
<u>LIABILITIES</u>						
Funds held for school organizations	:					
Athletics	\$	1,572	0		270	1,302
General		4,560	2,679	300	7,251	288
Yearbook		450	490		500	440
Campus Beautification		1,618	0	(300)	0	1,318
Total liabilities	\$	8,200	3,169	0	8,021	3,348

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REGULATORY BASIS

## CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - REGULATORY BASIS PREPARED FOR THE OKLAHOMA STATE DEPARTMENT OF EDUCATION FOR THE YEAR ENDED JUNE 30, 2022

Federal Grantor / Pass Through Grantor / Program Title	Federal Assistance Listing Number	Project Number	Program or Award Amount	Balance at 7/1/21	Revenue Collected	Total Expenditures	Balance at 6/30/22
U.S. DEPARTMENT OF EDUCATION - Direct Programs:							
Indian Education	84.060	561	\$ 4,000		4.000	4.000	
Small Rural School Achievment	84.358	588	986		986	986	
Sub-Total	04.550	300	4,986		4,986	4,986	
Sub-Total			4,300		4,300	4,300	
Passed Through State Department of Education:							
Title I, Basic Program	84.010	511	16,060		16,060	16,060	
Title I, School Improvement	84.010	515	92,917		86,801	86,801	
Title I, School Improvement 2020-21	84.010	799	•	18,318	18,318	•	
Title II, Part A	84.367	541	1,650	•	1,650	1,650	
ARP IDEA-B Flow Through COVID-19	84.027X	628	2,871		2,871	2,871	
ARP IDEA-B Preschool COVID-19	84.027X	643	163		163	163	
IDEA-B Flow Through	84.027	621	12,352		12,352	12,352	
IDEA-B Preschool	84.173	641	74		74	74	
Title IV, Part A	84.424	552	10,000		10,000	10,000	
COVID-19 - ESF:					,	,	
ESSERF / CARES Act	84.425D	788	1,063		1,063	1,063	
ESSERF	84.425D	789	4.382		4,382	4,382	
ESSER II	84.425D	793	23,987		23,987	23,987	
ARP - ESSER III	84.425U	795	112,312		47,487	47,487	
Total COVID-19 - ESF	511.120		141,744		76,919	76,919	
Sub Total			277,831	18,318	225,208	206,890	0
Total Federal Assistance			\$ 282,817	18,318	230,194	211,876	0

Note 1 - This schedule was prepared on a regulatory basis of accounting consistent with the preparation of the combined financial statements.

Note 2 - None of the federal programs include any loan programs, loan guarantee programs, has no sub-recipients and does not use the 10% de minimis indirect cost rate.

# CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY STATEMENT OF STATUTORY, FIDELITY AND HONESTY BONDS FOR THE YEAR ENDED JUNE 30, 2022

BONDING COMPANY	POSITION COVERED	BOND NUMBER	 OVERAGE MOUNT	EFFECTIVE DATES
RL! Surety				
	Head of School	LSM1180404	\$ 100,000	7/01/21 - 7/01/22
	Treasurer	LSM1180406	100,000	7/01/21 - 7/01/22
	Encumbrance Clerk	LSM1180405	1,000	7/01/21 - 7/01/22
	Admin. Assistant (minutes clerk)	LSM1180405	1,000	7/01/21 - 7/01/22
	Activity Fund Clerk	LSM1345083	1,000	9/12/21 - 9/12/22

## CARLTON LANDING ACADEMY NO. E-20, PITTSBURG COUNTY SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT

JULY 1, 2021 TO JUNE 30, 2022

State of Oklahoma	)
	) ss
County of Tulsa	)

The undersigned auditing firm of lawful ages, being first duly sworn on oath says that said firm had in full force and effect Accountant's Professional Liability Insurance in accordance with the "Oklahoma Public School Audit Law" at the time of audit contract and during the entire audit engagement with Carlton Landing Academy for the audit year 2021-22.

Bledsoe, Hewett & Gullekson Certified Public Accountants, PLLLP Auditing Firm

Authorized Agent

Subscribed and sworn to before me This 10<sup>th</sup> day of March, 2023

Notary Public (or Clerk or Judge)

My Commission Expires: 12/11/2024 Commission No. 20014980

Eric M. Bledsoe, CPA Jeffrey D. Hewett, CPA Christopher P. Gullekson, CPA

P.O. BOX 1310 • 121 E. COLLEGE ST.• BROKEN ARROW, OK 74013 • (918) 449-9991 • (800) 522-3831 • FAX (918) 449-9779

March 10, 2023

Ms. Amanda Tucker, Head of School Carlton Landing Academy 10 Boulevard Carlton Landing, Oklahoma 74425

Dear Ms. Tucker:

Listed below are the observations and recommendations from the final audit work we performed for you. Please review them very carefully, along with the review copy of your audit report. If you have questions or desire additional information, please call us so that any discrepancies may be resolved.

The following section contains the observations relayed to management that are control deficiencies, which we feel need to be communicated to you so appropriate action may be taken to correct these deficiencies. These items are not included in your audit report, as they are not considered material or immaterial in nature. They are simply observations of some minor findings that could evolve into immaterial or material findings if not addressed or corrected.

#### **Activity Fund Deposits**

During the audit, we observed a few instances where the activity fund custodian was not depositing the revenue on a timely basis. Oklahoma Statutes require that, "Deposits of funds shall be made the next business day, however, if the deposit for a day totals less than \$100, a school district may accumulate monies required to deposited into the fund on a daily basis until the total accumulated balance of deposits equals or exceeds \$100. Provided, a school district shall deposit accumulated monies into the fund not less than one time per week, regardless of whether the monies total \$100." We observed some weeks during the year in which no revenue was deposited on any of the days where accumulated monies exceeded \$100.

#### **Activity Fund Receipts**

When testing the activity fund receipting procedures, we noted there is not a clear audit trail from when collections are made to the corresponding bank deposit. The activity fund custodian is properly receipting collections but is not always using the correct date when using pre-numbered receipts. It appears the activity fund custodian is using check dates rather than the date the check was received, causing a discrepancy in date order with the pre-numbered receipts.

We recommend that all activity funds collected be receipted in pre-numbered receipt books, with a receipt copy with the date of the collection being issued to any student or patron from whom money is received, and all receipt books be kept on file for review. This procedure will ensure that all funds receipted were properly deposited and provide a source document for both parties as to the amount of funds given to the activity fund.

#### **Administrative Costs**

It appears the School exceeded its allowable administrative costs by approximately \$15,269. Total administrative costs, according to OCAS, was \$71,835. Allowable administrative costs for the School were \$56,566. We recommend that procedures be implemented to ensure that administrative costs to do exceed what is allowable under Oklahoma Statutes. The School should review what salaries are being coded as administrative costs and determine what steps can be taken to reduce these costs.

We take this opportunity to thank you and your professional staff for the outstanding cooperation and invaluable assistance you gave us during our recent onsite audit work.

Sincerely,

Christopher P. Gullekson

For

Bledsoe, Hewett & Gullekson Certified Public Accountants, PLLLP